

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DISTRICT

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
v.)	No. 4:13CR00457 CEJ (TIA)
)	
JASON W. KIRLIN, et al.,)	
)	
Defendant.)	

GOVERNMENT'S DISCLOSURE OF ARGUABLY SUPPRESSIBLE EVIDENCE
PURSUANT TO FEDERAL RULE OF CRIMINAL PROCEDURE 12(b)(4)

Comes now the United States of America, by and through its attorneys, Richard G. Callahan, United States Attorney for the Eastern District of Missouri, and Jennifer A. Winfield, Assistant United States Attorney for said District, and makes the following disclosures pursuant to Federal Rule of Criminal Procedure 12(b)(4):

At trial, the Government intends to use the evidence seized and statements made by the defendants during the events described below. This evidence and these statements are more fully set forth in investigative reports which have been made available to defendants.

The Government has listed all of the defendants that it believes could possibly argue standing to contest each matter, although the Government is in no way conceding that these individuals, in fact, have standing on these events. Furthermore, the fact that certain defendants are listed as associated with each event would not preclude any other defendant from claiming standing.

DATE	EVENT/ITEM	DEFENDANT
Varies	Airline Flight Records from: Southwest Airlines United Airlines American Airlines Frontier Airlines US Airways	Kirlin Caparro Davidson Alfonso Lewis Fox Beke
Varies	Autohouse Maintenance & Bank Records	Caparro
03/2010	Best Western Receipt-Susan Smith	Smith
07/2013	Carnegie Mellon Analysis of Encrypted Computers-Kirlin	Kirlin/Davidson
09/2012	Certified Copy-SW & Affidavit-1795 40 th Avenue	Caparro/Beke
09/2012	Certified Copy-SW & Affidavit-3908 Mountain Home Ranch Rd	Kirlin/Davidson
09/2012	Certified Copy-SW & Affidavit -3465 Kings Hill Rd	Kirlin/Davidson
09/2012	Certified Copy-SW & Affidavit -3821 Porter Creek Rd	Kirlin/Davidson
03-04/2009	Commerce Bank Records-Ossowski	Ossowski
11/2011	Consent Form-Pamela Fox	Fox
06/2013	DEA-6 Interview of CS re trip for Caparro	Caparro
12/2012	DEA-6 Interview of M.B. Thomas R.V. Dealer	Fox
12/2012	DEA-6 Interview of Steve Emerson	Emerson
10/2012	DEA-6 Kirlin's landlord interview	Kirlin/Davidson
02/2013	DEA 6- Lyra Beke Interview	Beke
12/2012	DEA-6 re 1795 40 th Ave-execution of search warrant	Caparro/Beke
09/2012	DEA-6 re 3821 Porter Creek Rd-execution of search warrant	Kirlin/Davidson
12/2012	DEA-6 re Caparro and Alfonso arrest	Caparro/Alfonso
01/2013	DEA-6 re Ford 500 at SFO Airport	Smith
06/2011	DEA-6 re Initial Surveillance-Kirlin Residence	Kirlin/Davidson
04/2013	DEA-6 re Interview of John Ossowski	Ossowski
02/2013	DEA-6 re Kirlin RV Title Investigation	Kirlin/Ossowski
01/2013	DEA-6 re Marijuana Seizure from RV-Highland IL	Fox
05/2011	DEA-6 re Moonrise Hotel – Davidson & Beke	Davidson/Beke
11/2011	DEA-6 re Pamela Fox Tennessee Arrest	Fox
11/2011	DEA-6 re Pamela Fox Post Arrest Interview	Fox
08/2013	DEA-6 re Receipt of Cell Phone from CS	Caparro
07/2013	DEA-6 re Red Roof Inn	Smith
12/2012	DEA-6 re Seizure of Cessna	Caparro
04/2013	DEA-6 re Supplement to 12.13.12 report-Emerson Interview	Emerson

DATE	EVENT/ITEM	DEFENDANT
06/2013	DEA-6 re Talk with the CS re: Caparro	Caparro
09/2012	Drug Ledger-Kirlin's Vehicle-3908 Mountain Home Ranch Road	Kirlin/Davidson
12/2012	Highland Illinois Police Report re Marijuana seized from RV	Fox
Varies	Hilton Hotel Records for Pam Fox	Fox
09/2012	Inventory List-3821 Porter Creek Rd	Kirlin/Davidson
09/2012	Inventory List-3908 Mountain Home Ranch Road	Kirlin/Davidson
09/2012	Inventory List-3465 Kings Hill Road	Kirlin/Davidson
04/2013	IRS Report re Bank Summary-All Star Motors	Ossowski
12/2012	IRS Report re Branch Manager at US Bank	Kirlin/Davidson
09/2013	IRS Report re Geoff Auto-Smith Ford500	Smith
04/2013	IRS Report re Interview of RV Owner	Fox
08/2012	IRS Report re Interview: St. Louis Mineral Club re Money Orders	Kirlin
12/2012	IRS Report re Interview re polygraphs in California-Kirlin	Kirlin
11/2012	IRS Report re Tax Preparer Interview	Kirlin
09/2012	IRS Report re US Bank Assistant Manager	Kirlin/Davidson
06/2013	IRS Report re Vehicle Search after Susan Smith Interview	Smith
08/2013	IRS Report re: Falsified-Bus-Income-Rock Positive	Kirlin
04/2013	Lab Results from RV seizure Highland IL	Fox
12/2013	MB Thomas RV Rental Records	Fox
04/2013	Midwest RV Interview re Ossowski-Kirlin purchase of the RV	Kirlin/Ossowski
09/2012	Overflight Photos-Kings Hill	Kirlin/Davidson
12/2009	Pam Fox_8300 form for 2007 Saab	Fox
09/2012	Photos -1795 40 th Ave	Caparro/Beke
09/2012	Photos-3465 Kings Hill Road	Kirlin/Davidson
09/2012	Photos-3821 Porter Creek Road	Kirlin/Davidson
09/2012	Photos-3908 Mountain Home Ranch Road	Kirlin/Davidson
02/2013	Postal Lab Rpt-Exhibits A9-A13 (Lab: 9-305-008614(1))	Kirlin/Davidson
02/2013	Postal Lab Rpt-Cell Phones Exhibits: A1-A8 (Lab:9-305-008614(2))	Kirlin/Davidson
02/2013	Postal Lab Rpt-TD & SD Cards Exh:A14(Lab 9-305-008614(3))	Kirlin/Davidson
08/2013	Postal Lab Rpt-Exhibit A10 (Lab 9-305-008614(4))	Kirlin/Davidson
06/2013	Postal Interview of Susan Smith and waiver	Smith
07/2013	Carnegie Mellon Analysis Report re Encrypted Computer	Kirlin/Davidson
01/2013	Postal Memo re execution of search warrant at 1795 40 th Avenue	Caparro/Beke
09/2012	Printout-LGTRACFONE ending #6520(3908 Mountain Home Rd)	Kirlin/Davidson

DATE	EVENT/ITEM	DEFENDANT
02-06/2010	Records for Lyra BEKE-Moonrise Hotel	Beke
09/2010	Red Roof Inn-Registration Slip	Smith
09/2012	Sonoma County Report re Search Warrant-3465 Kings Hill Road	Kirlin/Davidson
09/2012	Sonoma County Report re Search Warrant-3821 Porter Creek Rd	Kirlin/Davidson
09/2012	Sonoma County Rpt re SearchWarrant-3821 Porter Creek Rd-Supp	Kirlin/Davidson
09/2012	Sonoma County Report-3811 Porter Creek Rd	Kirlin
09/2012	Sonoma County Report-3811 Porter Creek Rd-2	Kirlin
09/2012	Sonoma County Report-3809 Mountain Home Ranch Road	Kirlin/Davidson
11/2011	Tennessee State Trooper Report-Pamela Fox Arrest	Fox
11/2011	Tennessee Ticket-Pamela Fox	Fox
05/2011	Video from Moonrise Hotel	Beke/Davidson

Respectfully submitted,

RICHARD G. CALLAHAN
United States Attorney

s/ Jennifer A. Winfield

JENNIFER A. WINFIELD, #53350MO
Assistant United States Attorney
111 South 10th Street, Room 20.333
St. Louis, MO 63102
(314) 539-2200

CERTIFICATE OF SERVICE

I hereby certify that on December 4, 2013, the foregoing was filed electronically with the Clerk of the Court to be served by operation of the Court's electronic filing system upon counsel of record.

s/ Jennifer A. Winfield

JENNIFER A. WINFIELD, #53350MO
Assistant United States Attorney